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Plaintiffs' Co-Lead Counsel

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Plaintiffs hereby submit this Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed.

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
1	Plaintiffs' Supplemental Brief in Support of Sanctions	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
2	Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Brief in Support of Sanctions	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
3	Exhibits 89–98, 100–134, and 136–139 to the Declaration of Lesley E. Weaver	Entire documents	Defendant to provide evidence, per Local Rule 79-5(f)
4	Declaration of Cari C. Laufenberg and Matthew S. Melamed in Support of Plaintiffs' Supplemental Brief in Support of Sanctions	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
5	Declaration of David J. Ko in Support of Plaintiffs' Motion for Sanctions	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)

Because the above documents contain, reference, or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action, Plaintiffs file the documents provisionally under seal. Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable.

Dated: August 8, 2022

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser
Derek W. Loeser

Derek W. Loeser (admitted *pro hac vice*)
Cari Campen Laufenberg (admitted *pro hac vice*)
David Ko (admitted *pro hac vice*)
Adele A. Daniel (admitted *pro hac vice*)
Benjamin Gould (SBN 250630)
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Respectfully submitted,

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver
Lesley E. Weaver

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Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of August, 2022 in Oakland, California.

By: /s/ Lesley E. Weaver
Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on August 8, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy of the under seal filing to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Lesley E. Weaver
Lesley E. Weaver